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MEMO ENDORSED

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February 16, 2021

BY ECF

The Honorable Louis L. Stanton
United States District Judge
United States District Court, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 2/18/21
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Re: Chanel, Inc. v. WGACA, LLC, et al., 18-cv-02253 (LLS)

Dear Judge Stanton:

This law firm represents plaintiff Chanel, Inc. ("Chanel") in the above-referenced matter. Pursuant to Your Honor's Individual Practices in Civil Cases Rule 3.B, we write to respectfully request that Your Honor issue an order permitting Chanel to file under seal Chanel's letter motion to compel the WGACA Defendants ("Defendants") to serve amended responses and produce Rule 30(b)(6) witnesses. Chanel's letter motion contains copious citations to recent deposition testimony, which are also exhibits to the letter motion, and pursuant to the parties' Stipulated Protective Order these depositions are to be maintained confidential until fourteen days after their receipt. That time period has not passed and Chanel requests that the brief and exhibits be temporarily filed under seal on this ground. Chanel will file a redacted version of the brief and exhibits once the designations regarding these new depositions have been clarified.

Thank you for your attention to this matter.

Respectfully submitted,

/s/ Dylan J. Price

Dylan J. Price

cc: All Counsel of Record

Denied
for lack
of any
showing that any
item meets the high
standards of Lugosh
and similar cases.
Louis L. Stanton
2/18/21